

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY FOR AN) CASE NO.
ADJUSTMENT OF ITS ELECTRIC AND GAS) 2018-00295
RATES)

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO WALMART INC. AND KROGER COMPANY

Walmart, Inc., (Walmart) and Kroger Company (jointly Walmart/Kroger), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on February 14, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Walmart/Kroger shall make timely amendment to any prior response if Walmart/Kroger obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Walmart/Kroger fails or refuses to furnish all or part of the requested information, Walmart/Kroger shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Walmart/Kroger shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Gregory W. Tillman, page 22, lines 9–14, addressing the situation should the Commission approve a revenue requirement less than that proposed by Louisville Gas and Electric Company (LG&E) and setting forth Walmart’s recommended allocation methodology regarding such reduction. Walmart proposes that 25 percent of any reduction in LG&E’s proposed revenue requirement be applied proportionately to the non-lighting classes with a current relative return of greater than 100 percent. Additionally, Walmart proposes the remaining 75 percent of the reduction should be used to proportionately reduce LG&E’s proposed increase to all rate classes.

- a. Explain how the 25/75 allocation was chosen.
- b. Confirm that Walmart's proposal to apply the remaining 75 percent of any revenue reduction proportionately to all rate classes would include the Special Contracts and Lighting classes.


For _____
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DATED **JAN 31 2019**

cc: Parties of Record

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